



**ZACHARY W. CARTER**  
*Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**JOSEPH ANCI**  
Senior Counsel  
Labor & Employment Law Division  
Phone: (212) 356-1106  
Fax: (212) 356-2439  
E-mail: janci@law.nyc.gov

November 14, 2017

**By ECF**

Honorable Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Re: Bloomberg v. The New York City Department of Education and Carmen Farina  
17-CV-3136 (PGG)

Dear Judge Gardephe:

I am a Senior Counsel in the Labor and Employment Law Division of the New York City Law Department assigned to represent the defendants in the above-referenced action.

Defendants write to request an extension of time to serve their reply in further support of their motion to dismiss and opposition to plaintiff's cross-motion from Monday, November 20, 2017 to Monday, December 4, 2017. This is defendants' first request for an extension of time to file their reply and opposition. Plaintiff's counsel, Maria Chickedantz, Esq., consents to this request.

This request is necessary because of my heavy workload, which includes finalizing joint pre-trial orders, federal and state motions, depositions, and mediations that are scheduled for the next few weeks.

For the foregoing reasons, it is respectfully requested that the Court extend the defendants' time to file and serve their reply in further support of their motion to dismiss and their opposition to plaintiff's cross-motion to Monday, December 4, 2017.

Thank You for Your consideration herein.

Respectfully submitted,

\_\_\_\_\_/s/  
Joseph Anci  
Senior Counsel

cc: Maria Chickedantz, Esq. (By ECF)